

Joleen K. Youngers, As the Personal
Representative of the Wrongful Death Estate of
Roxsana Hernandez

Plaintiff,

v.

LaSalle Corrections Transport LLC, LaSalle
Corrections West LLC, LaSalle Management
Company LLC, Global Precision Systems LLC,
TransCor America LLC, CoreCivic, Inc., and
United States of America,

Defendants,

and

Global Precision Systems, LLC

Third-Party Plaintiff,

v.

Asset Protection and Security Services, L.P.,

Third-Party Defendant

Case No. 20-cv-00465-WPJ-JHR

**PLAINTIFF’S COUNSEL’S AFFIDAVIT IN SUPPORT OF
MOTION FOR COMMISSION FOR OUT-OF-STATE SUBPOENAS**

I, Ken Massey, counsel for Plaintiff Joleen K. Youngers (“Plaintiff”), as the Personal Representative of the Wrongful Death Estate of Roxsana Hernandez (“Roxsana”), being duly sworn, deposes and says:

1. I am an attorney admitted *pro hac vice* to represent Plaintiff.
2. I make this Affidavit in support of Plaintiff’s unopposed Motion for Commission Out-of-State Subpoenas for the depositions of Mitchell A. Amezquita, Hector G. Ramirez, Fabiola Davenport, and Endy Zavala, each of whom reside in Texas.

3. A detailed investigation and due diligence reveal that Mitchell A. Amezcuita, Hector G. Ramirez, Fabiola Davenport, and Endy Zavala have the following service address:

Mitchell A. Amezcuita
624 La Florida Drive
Canutillo, Texas 79835

Hector G. Ramirez Jr.
1206 Wahlen Ln.
Fabens, TX 7983

3266 Peruvian Pesco
El Paso, TX 79938

Fabiola Davenport
5604 Paradise Lane
El Paso, Texas 79924

Endy Zavala
10946 Gulf Valley Street
Houston, Texas 77075

4. Amezcuita is a former employee of Asset Protection and Security Services LP (“Asset Protection”). Based on Plaintiff’s investigation, Amezcuita was an Asset Protection booking officer who processed Ms. Hernandez into the ICE Service Processing Center in El Paso, Texas (“El Paso SPC”), an ICE facility operated by Asset Protection and Defendant Global Precision Systems, LLC (“GPS”), on May 15, 2018.

5. Ramirez is a former employee of GPS. Based on Plaintiff’s investigation, Ramirez was a Detention Officer at El Paso SPC on duty May 15-16, 2018 whose post was the holding cell Ms. Hernandez was held in while in GPS’s custody. Plaintiff anticipates that Officer Ramirez will provide information about the condition of Ms. Hernandez while she was in GPS’s custody.

6. Davenport is a former Transportation Officer at Asset Protection. Based on Plaintiff’s investigation, Officer Davenport oversaw the transport by bus of Ms. Hernandez from El Paso SPC to a substation in Albuquerque, New Mexico, for further transport by another

contractor. Plaintiff anticipates that Officer Davenport will provide information regarding the condition of the bus and any incidents on the bus during transport.

7. Zavala is a former employee of LaSalle Corrections Transport LLC, LaSalle Corrections West LLC, and/or LaSalle Management Company LLC (collectively “LaSalle”). Based on Plaintiff’s investigation, Zavala was LaSalle’s Lieutenant who was responsible for coordinating the logistics of transferring Ms. Hernandez and other transgender detainees from ICE’s Enforcement and Removal Operations in San Ysidro, California to various facilities in California, Arizona, and Texas on May 14-15, 2018. Plaintiff anticipates that Lieutenant Zavala will provide information on Ms. Hernandez’s condition during transport and the transfer of Ms. Hernandez’s medical files and paperwork.

8. The undersigned counsel submits this Motion for Commission to seek orders be issued permitting the District Court clerks of Harris County and El Paso County to issue subpoenas to take the depositions by oral questions of non-party deponents, Mitchell Amezcuita, Fabiola Davenport, Hector Ramirez, and Endy Zavala.

I swear under penalty of perjury that this information is true and correct.

Dated: September 6, 2024

/s/ Ken Massey
Ken Massey, *Pro Hac Vice*